

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

COURTHOUSE NEWS SERVICE,

Plaintiff,

v.

JOANNA STATON, in her official capacity as
Bell County District Clerk, et al

Defendants.

Court Case No. 4:24-cv-00368

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S AMENDED
FIRST AMENDED COMPLAINT**

TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE:

On August 19, 2024, Defendant Megan LaVoie, in her official capacity as Administrative Director of the Texas Office of Court Administration, filed a Motion to Dismiss Plaintiff's Amended First Amended Complaint (the "Motion") [Dkt. #65]. Plaintiff's current deadline to respond to the Motion is September 3, 2024. Plaintiff requests a three week extension of this deadline to September 24, 2024.

Plaintiff has good cause for the extension and is not sought for delay. The undersigned's schedule in the next two weeks includes a hearing on August 27 in state court in Travis County, out of town travel on August 28-29 for a client board meeting, and all day deposition preparation on August 30 and September 3. Counsel is then defending an expert deposition on September 5 and defending a client deposition on September 10. Finally, counsel has a longtime commitment to travel out of Texas on September 12-13. Accordingly, Plaintiff respectfully requests the Court grant this motion and extend the deadline to September 24, 2024 to respond to the Motion.

Date: August 22, 2024

Respectfully submitted,

JACKSON WALKER L.L.P.

By: /s/ Matt Dow
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ATTORNEYS FOR PLAINTIFF
COURTHOUSE NEWS SERVICE

CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing document will be accomplished through the notice of electronic filing in accordance with the Federal Rules of Civil Procedure on this the 22nd day of August, 2024.

/s/ Matt Dow
Matt Dow

CERTIFICATE OF CONFERENCE

I hereby certify that counsel has conferred with opposing counsel in a good faith attempt to resolve the matter without court intervention, and the motion is unopposed.

/s/Matt Dow

Matt Dow